UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

)	
DHIMITER S. LLORDI AND NATALIA)	
HOSHOVSKY, on behalf of themselves and)	
all others similarly situated,)	
)	
Plaintiffs)	
)	
v.)	1:18-CV-11064-PBS
)	
JP MORGAN CHASE BANK, N.A.)	
)	
Defendants)	
)	

JOINT REQUEST FOR ADJOURNMENT OF SCHEDULING CONFERENCE AND MOTION HEARING

Upon transfer from Judge Talwani, this Court issued notices that a scheduling conference pursuant to Federal Rule of Civil Procedure 16(b) and a motion hearing on Defendant JPMorgan Chase Bank N.A.'s Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(b)(1) & 12(b)(6) would be held on May 9, 2019. ECF Nos. 27, 28, 29.

Plaintiffs Dhimiter S. Lordi and Natalia Hoshovsky and Defendant JPMorgan Chase Bank, N.A. (collectively, the "Parties") have been engaged in good-faith settlement negotiations and have made meaningful progress towards a potential resolution of this case. In view of those developments, and in light of the fact that counsel for the Parties would be traveling from outside the Commonwealth to attend Thursday's conference, the Parties respectfully request that the scheduling conference and motion hearing be adjourned for a period of thirty (30) days to allow the Parties to continue their negotiations and hopefully reach a settlement.

Dated: May 7, 2019

Respectfully submitted,

Plaintiffs,

Defendant,

DHIMITER S. LLORDI AND NATALIA HOSHOVSKY By Their Attorney, JPMorgan Chase Bank, N.A. By its Attorneys,

/s/ Todd S. Dion

/s/Adam M. Cambier

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